

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation,

Plaintiff,

V.

JOHN DOES 1-50,

#### Defendants.

No. 2:19-cv-1445

DECLARATION OF WESLEY  
BRANDI IN SUPPORT OF  
AMAZON.COM, INC.'S MOTION  
FOR EXPEDITED DISCOVERY

I, Wesley Brandi, have personal knowledge of the facts described below, am competent to make this declaration, and declare as follows:

1. I am the Founder of iPensatori, which is a consulting and software engineering business based in Washington state that specializes in the mitigation of online fraud and abuse. I have a Ph.D. in computer science, and have over ten years of experience investigating malicious online conduct like the scheme described below.

2. iPensatori was retained by Davis Wright Tremaine, LLP (“DWT”) to investigate certain online marketing conduct. As part of this engagement, and to start the investigation, DWT provided me email messages that were received by victims.

## A. Defendants' Marketing Scheme

3. Defendants' marketing scheme begins with emails to victims. A partial screenshot of one of Defendants' emails is below:



1  
2 Thank you for your recent Purchase on Amazon.  
3

4 Your invited to review your product and redeem your new 50-reward.  
5

6 Your feedback helps customers pick the right products on Amazon.  
7

It's an quick process! You are just one click away to activate your \$50 voucher.  
8

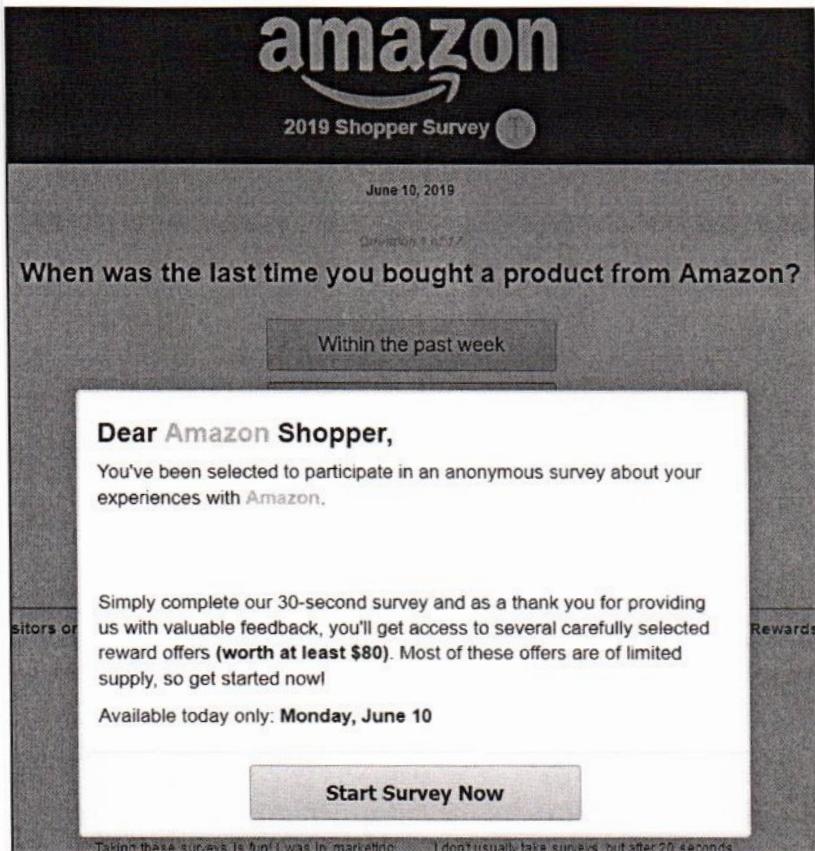
See Here

9 4. Defendants send these emails from email addresses that use Amazon's name,  
10 such as amazon.perks@fondationeaccess.com and amazon.survey@fasionsitejerseys.com.  
11 Defendants registered some of the domains used to send these emails with the registrars  
12 NameSilo, LLC; Namecheap, Inc.; and GoDaddy.com, LLC. Defendants host (or hosted)  
13 many of the domains used to send these emails with companies DedicatedNOW, Inc. and  
14 BitAccel, LLC.

15 5. Upon clicking the link in Defendants' emails, victims are redirected through a  
16 series of two or three domains that do not render content in the victims' browser, but serve to  
17 redirect victims to Defendants' survey. Defendants have used a number of redirect domains to  
18 funnel traffic, such as prematrinela.com and tboksolutions.com. Defendants registered their  
19 redirect domains with the registrars Name.com, Inc. and GoDaddy.com, LLC. Defendants host  
20 these domains with companies Clickbooth.com, LLC, OVH US LLC, Choopa, LLC, and  
21 Webapps, LLC.

22 6. After being referred through Defendants' redirect domains, victims arrive on  
23 Defendants' survey page. When victims first arrive on Defendants' landing page, they see a  
24 greeting that often addresses them as "Amazon Shopper." Defendants use numerous domains,  
25 and services from multiple companies, to operate their survey. For example, they registered  
26 one survey domain with GoDaddy.com, LLC, used services from Cloudflare, Inc. to mask the  
27

1 true host of another survey, and hosted surveys with Rackspace, Inc., Mean Servers Limited,  
 2 and OVH US LLC. A partial screenshot of one version of Defendants' survey page is below:



17        7. After completing one of Defendants' surveys, victims are presented with  
 18 "rewards" or "offers." Clicking one sends victims through a series of redirect domains, an  
 19 affiliate network, and ultimately to an advertiser. Defendants use a number of services from  
 20 third-party companies as part of these redirects, such as Clickbooth.com, LLC.

21        **B. Defendants' Identities**

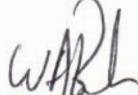
22        8. I have unsuccessfully attempted to uncover Defendants' identities through  
 23 various methods, including online research of their domains. The only publicly available  
 24 information about Defendants is the infrastructure they use to perpetuate their scheme.

25        9. After I identified the domains Defendants used to host their websites, I utilized  
 26 publicly available data to determine the various companies that registered Defendants' domains

1 and hosted Defendants' content. However, I could not (and cannot) determine the identity of  
2 the persons behind the websites from public records. Among other factors preventing me from  
3 uncovering Defendants' identities is Defendants' use of anonymizing services to register  
4 domains.

5 I declare under penalty of perjury under the laws of the United States of America that  
6 the foregoing is true and correct.

7 Executed this 9<sup>th</sup> day of September, 2019, at North Bend, Washington.

8   
9 Wesley Brandi

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